

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DISTRICT**

CENTRAL STATES, SOUTHEAST AND )  
SOUTHWEST AREAS PENSION FUND, )  
and HOWARD McDOUGALL, Trustee, )

Plaintiffs, )

Case No. 08 c 0100

\_\_\_\_\_ V. )

Judge St. Eve

MADISON ACQUISITION, LLC,  
an Indiana limited liability company,

Magistrate Judge Nolan

Defendant. )

# NOTICE OF MOTION

TO: Madison Acquisition, LLC  
c/o James E. Carlberg  
2700 First Indiana Plaza  
135 N. Pennsylvania St.  
Indianapolis, IN 46204

PLEASE TAKE NOTICE that on Tuesday, February 19, 2008 at the hour of 8:30 a.m., or as soon thereafter as counsel may be heard, the Plaintiffs' attorney will appear before the Honorable Judge St. Eve, Judge of the United States District Court for the Northern District of Illinois, located at 219 South Dearborn Street, Chicago, Illinois, or such other Judge as may be sitting in her stead, and present Plaintiffs' Motion for Entry of Judgment by Default.

Respectfully submitted,

/s/ Timothy C. Reuter  
Timothy C. Reuter

**CERTIFICATE OF SERVICE**

I, Timothy C. Reuter, one of the attorneys for Plaintiffs, Central States, Southeast and Southwest Areas Pension Funds, certify that I served the foregoing Notice of Motion and Plaintiff's Motion for Entry of Default and Default Judgment on Defendant by mailing said Notice of Motion and Plaintiff's Motion for Entry of Default and Default Judgment to:

Madison Acquisition, LLC  
c/o James E. Carlberg  
2700 First Indiana Plaza  
135 N. Pennsylvania St.  
Indianapolis, IN 46204

Said Notice of Motion and Plaintiff's Motion for Entry of Default and Default Judgment was sent via UPS overnight delivery, tracking number 1Z 395 1X9 22 1010 5775, from 9377 West Higgins Road, Rosemont, Illinois, 60018-4938, this 13<sup>th</sup> day of February, 2008.

/s/ Timothy C. Reuter

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Timothy C. Reuter

One of Central States' Attorneys